

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of:	)	
	)	
Revision of the Commission's Rules	)	
To Ensure Compatibility with	)	CC Docket No. 94-102
Enhanced 911 Emergency Calling Systems	)	
	)	
Phase II Compliance Deadlines for Non-	)	
Nationwide CMRS Carriers	)	

February 1, 2003 Quarterly Report

**QWEST WIRELESS, LLC AND TW WIRELESS, LLC**  
**FEBRUARY 1, 2003 PHASE II IMPLEMENTATION STATUS REPORT**

**Introduction and Summary**

Qwest Wireless, LLC and TW Wireless, LLC (collectively, "Qwest Wireless")<sup>1</sup> submit this quarterly E911 Phase II Implementation Status Report, and appended Affidavit, as required by the Federal Communications Commission ("Commission") *Phase II Stay Order*.<sup>2</sup> In that *Order*, the Commission granted extensions of E911 Phase II network upgrade and interim handset deployment deadlines to Tier II and Tier III wireless carriers.

In the *Phase II Stay Order*, the Commission established quarterly reporting requirements for affected carriers.<sup>3</sup> The purpose of these reports is to provide specific

---

<sup>1</sup> This filing is submitted on behalf of both Qwest Wireless, LLC and TW Wireless, LLC. Together these companies form a joint venture in which Qwest Wireless, LLC, holds a majority equity and sole controlling ownership interest. This joint venture provides broadband Personal Communications Services ("PCS") in a number of markets.

<sup>2</sup> *In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems – Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers, Order to Stay*, CC Docket No. 94-102, FCC 02-210 (rel. July 26, 2002) ("*Phase II Stay Order*").

<sup>3</sup> *Id.* n.45.

and verifiable information to the Commission so that it can better monitor Tier II carriers' progress on E911 wireless deployment. The reports will also allow the Commission to assess whether carriers are in compliance with the *Phase II Stay Order's* benchmarks and other applicable provisions of the E911 rules.<sup>4</sup>

### **Status of Pending Phase I and Phase II Requests**

The Commission asks for a status report regarding all pending Phase I and Phase II requests.<sup>5</sup> Attached as Appendix A, Qwest Wireless provides information in a chart form, updated from its November, 2002 submission, of the status of its various wireless E911 activities. Only one Public Service Answering Point ("PSAP") request for service received by Qwest Wireless and not affected by the Commission's *Phase II Stay Order* has been pending for more than six months. Scottsbluff County, Nebraska requested Phase I service on July 22, 2002 and its order has not yet been completed. This is due to difficulties Qwest Wireless has had achieving successful interconnection in that territory (served by a non-Qwest local exchange carrier). No public interest is harmed by this situation, however, since Qwest Wireless does not currently have active customers in the County.

With respect to other Phase I and Phase II 911/E911 requests, Qwest Wireless is proceeding with its deployments. In the past, Qwest Wireless has not requested supporting readiness documentation as provided for in Section 20.18(j) of the Commission's rules.<sup>6</sup> Thus, PSAPs representing that they will be capable of receiving

---

<sup>4</sup> *Id.* ¶ 31.

<sup>5</sup> *Id.* ¶ 29.

<sup>6</sup> 47 C.F.R. § 20.18(j). Generally, PSAP requests contain statements that the PSAP has ordered necessary E911 equipment and has commitments from suppliers to have the equipment installed and operational within six months, and that the PSAP is

and utilizing the data elements associated with the respective E911 service (Phase I or Phase II) have been taken at their word and Qwest Wireless has proceeded with deployments in good faith.<sup>7</sup> As discussed below, Qwest Wireless will be changing this practice going forward.

**PSAPs' Compliance with Conditions Necessary for a Valid E911 Request**

The Commission asks carriers to identify questions or concerns they might have “concerning a PSAP’s compliance with the conditions necessary for a valid Phase I or II request, such as its readiness to receive and utilize Phase I or Phase II information.”<sup>8</sup> Qwest Wireless’ concerns in this area remain similar to those expressed in its November 2002 Report.<sup>9</sup> There Qwest Wireless outlined concerns it had about PSAPs’ expressions of readiness that were later changed due to technology, regulation or financial challenges.<sup>10</sup>

In the *Richardson Reconsideration Order*, the Commission largely resolved the practical regulatory conundrum facing wireless carriers when PSAPs originally state they are ready to proceed with Phase II deployments and then later change their minds – a matter totally outside the control of wireless carriers. Qwest Wireless intends to take advantage of the Commission’s practical resolution. Going forward, Qwest Wireless

---

communicating with its local exchange carriers (“LEC”) for necessary trunking and other facilities. Alternatively, for Phase II requests, PSAPs sometimes will state that they are using a Non-Call Path Associated Signaling (“NCAS”) technology and that they are making arrangements with their serving LEC for Automatic Location Information (“ALI”) database upgrades.

<sup>7</sup> See Qwest Wireless, LLC and TW Wireless, LLC November 1, 2002 Phase II Implementation Report at 2-3 (“November 2002 Report”).

<sup>8</sup> *Phase II Stay Order* ¶ 29.

<sup>9</sup> November 2002 Report at 3-4.

<sup>10</sup> *Id.*

does intend to request that PSAPs provide “readiness documentation” before Qwest Wireless places a PSAP’s request for service in formal queue. In the event that Qwest Wireless does not receive the requested documentation in a timely manner, it will consider its six-month deployment obligation tolled for the time being.

### **Handset Based Solution Benchmark Status**

The handset benchmarks the Commission articulated in its *Phase II Stay Order* require that Tier II wireless carriers “begin selling and activating” ALI-capable handsets by March 1, 2003 and then proceed to mandate percentage penetration requirements into calendar years 2004-05.

Qwest Wireless began selling Assisted Global Positioning Systems (“AGPS”) handsets on January 31, 2003 – well before the Commission’s anticipated “benchmark” date of March 1, 2003. Since some PSAPs in Qwest Wireless’ markets are currently receiving Phase II data, customers in those areas who are now purchasing the AGPS handsets will be able immediately to benefit from the Phase II functionality built into the handsets. Based on current vendor representations, Qwest Wireless anticipates it will also be able to meet the future handset penetration benchmarks, as well.

Respectfully submitted,

QWEST WIRELESS, LLC AND  
TW WIRELESS, LLC

By: Kathryn Marie Krause  
Sharon J. Devine  
Kathryn Marie Krause  
Suite 700  
1020 19<sup>th</sup> Street, N.W.  
Washington, DC 20036  
(303) 672-2859  
Its Attorneys

February 3, 2003

## APPENDIX A

### Current Deployments

<u>PSAP</u>	<u>Date Received</u>	<u>Request Type</u>	<u>Targeted Deployment Month/Year</u>	<u>Comments</u>
<b>Information on the Following PSAPS was Reported in the Qwest November, 2002 Quarterly Report This Appendix Includes Updated Information as Appropriate</b>				
Scottsbluff County, NE	07/22/02	Phase I	01/03	Deployment has been delayed due to Qwest Wireless' initial interconnection with a non-Qwest LEC; working with LEC to resolve connectivity issues.
Fremont County, NE	08/06/02	Phase I	02/03	On schedule.
Pinal County, AZ	10/08/02	Phase I	04/03	On schedule.
Cowlitz County, WA	05/05/02	Phase I	05/03	County requested suspend due to budget issues and taken out of suspend status on 11/02. <sup>1</sup>
Thurston County, WA	10/11/01	Phase I	04/03	County requested suspend due to budget issues and taken out of suspend status on 10/02.
Lewis County, WA	10/17/01	Phase I	05/03	County requested suspend due to budget issues and taken out of suspend status on 11/02.
Jefferson County, WA	03/11/00	Phase I	05/03	County requested suspend due to budget issues and taken out of suspend status on 11/02.

<sup>1</sup> In the November 1, 2002 Qwest Wireless Quarterly Report, Appendix A, Qwest Wireless reported -- based on prior oral communications -- that the Washington State PSAPs were to be "taken out of suspend status on 9/02." However, the paperwork associated with the requests to "unsuspend" was not received by Qwest Wireless until the later dates reflected in this current Appendix.

Columbia County, WA	04/25/02	Phase I	05/03	County requested suspend due to budget issues and taken out of suspend status on 11/02.
Clark County, WA	07/16/01	Phase I	05/03	County requested suspend due to budget issues and taken out of suspend status on 11/02.
Larimer County, CO	05/14/01	Phase II	02/02 <sup>2</sup>	E2 and ALI format implemented at PSAP on 01/31/03, targeting Qwest Wireless deployment in 02/03.
Boulder County, CO	07/09/01	Phase II	03/03	E2 and ALI format approved by PUC, waiting for date from PSAP as to when upgrades will be completed.
Arapahoe County, CO	10/23/01	Phase II	03/03	E2 and ALI format approved by PUC, waiting for date from PSAP as to when upgrades will be completed.
Summit County, CO	04/01/02	Phase II	Estimated 04/03	E2 and ALI format approved by PUC, waiting for firm date from PSAP as to when upgrades will be completed and Qwest Wireless should proceed with deployment.
Eagle County, CO	03/03/02	Phase II	Estimated 04/03	E2 and ALI format approved by PUC, waiting for firm date from PSAP as to when upgrades will be completed and Qwest Wireless should proceed with deployment.

<sup>2</sup> The Phase II tariff filed by Qwest Corporation (local exchange carrier) in Colorado was disputed and suspended. The Colorado PUC ruled that no valid PSAP requests could be tendered until the tariff was ruled approved and became effective. That tariff has now become effective. Thus, the deployment dates for the Colorado PSAPs have all been pushed ahead to later dates than those reflected in the November 1, 2002 Qwest Wireless Quarterly Report.

City and County of Denver, CO	06/27/02	Phase II	02/03	E2 and ALI format approved by PUC, implementation of format started on 01/31/03.
Anoka County, MN	04/12/01	Phase II	02/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment with Anoka scheduled for mid February.
Brookland Center, MN	04/12/01	Phase II	03/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.
Carver County, MN	04/12/01	Phase II	03/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.
Chisago County, MN	04/12/01	Phase II	03/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.
Dakota County, MN	04/12/01	Phase II	03/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.
Eden Prairie, MN	04/12/01	Phase II	03/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.
Edina, MN	04/12/01	Phase II	03/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.
Gladstone, MN	04/12/01	Phase II	03/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.

Hennepin County, MN	04/12/01	Phase II	03/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.
Maplewood, MN	04/12/01	Phase II	03/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.
Metro Airport, MN	04/12/01	Phase II	03/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.
Milwaukie, MN	04/12/01	Phase II	03/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.
Minneapolis, MN	04/12/01	Phase II	03/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.
Minnetonka, MN	04/12/01	Phase II	03/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.
Minnesota State Patrol	04/12/01	Phase II	03/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.
Ramsey County, MN	04/12/01	Phase II	03/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.
Santiam County, MN	04/12/01	Phase II	03/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.
St. Louis Park, MN	04/12/01	Phase II	03/03	Non-Phase II compliant



				HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.
St. Paul, MN	04/12/01	Phase II	03/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.
White Bear Lake, MN	04/12/01	Phase II	01/03	Non-Phase II compliant HCAS solution migrated to NCAS solution in 01/03. Deployment targeted for 03/03.
<p align="center"><b>The Following are NEW Requests Since the November, 2002 Quarterly Report</b></p>				
Spokane, WA	12/06/02	Phase I	06/03	
Bernalillo County, NM	01/02/03	Phase I	07/03	
Kitsap County, WA	12/10/02	Phase I	06/03	
Asotin County, WA	12/10/02	Phase I	06/03	
Walla Walla County, WA	12/10/02	Phase I	06/03	
Benton, WA	12/10/02	Phase I	06/03	

## Suspended Status PSAPs

<u>PSAP</u>	<u>Date Received</u>	<u>Request Type</u>	<u>Targeted Deployment Month/Year</u>	<u>Comments</u>
<b>There are no changes to this material, as reported in the November, 2002 Quarterly Report UNTIL the last two entries</b>				
Ada County, ID	04/03/01	Phase I	N/A	County does not have a cost recovery mechanism in place. PSAP refuses to deploy unless QW implements 911 for wireless which current state law does not cover (only wireline 911 surcharge addressed).
Dawson County, NE	07/15/02	Phase I	N/A	Qwest Wireless does not have coverage in county.
Hamilton County, NE	07/15/02	Phase I	N/A	Qwest Wireless does not have coverage in county.
Howard County, NE	07/15/02	Phase I	N/A	Qwest Wireless does not have coverage in county.
Merrick County, NE	07/15/02	Phase I	N/A	Qwest Wireless does not have coverage in county.
Murray County, UT		Phases I and II	N/A	PSAP does not have necessary equipment to support either P1 or P2.
Pennington County, SD		Phases I and II	11/02 (Phase I only)	County has not agreed to purchase Phase I equipment from LEC. County working with LEC to purchase without tariff. Per PSAP, Phase II capability at selective router is not available from LEC.
Skagit County, WA		Phase I	11/02	PSAP has not approved call routing or addressing. Once PSAP approves, testing and turn-up will begin.

Pierce County, WA		Phase I	11/02	Waiting for PSAP to sign contract. All facilities are in place and drive testing completed.
Chase County, NE	08/06/02	Phase I	N/A	QW does not have coverage in county.
Washington County, NE	07/15/02	Phase I	N/A	QW does not have coverage in county.
Washington County, OR	06/21/00	Phase I	N/A	PSAP refuses to accept address information. Not considered a valid request.
Island County, WA	06/20/01	Phase I	11/02	County requested suspension due to PSAP budget issues. Taken out of suspend status and targeted deployment for 10/02. On date of turn-up, issue identified with LEC information digit (7-digit router) not being provisioned correctly. Will attempt to resolve issue and targeting 11/02 deployment. If requested to order new circuits due to PSAP configuration change, deployment could be delayed until 12/02.
<p align="center"><b>The following two entries have been added to this section of Appendix A</b></p>				
Casper County, WY	05/03/02	Phase I	11/02	PSAP has communicated cost recovery in place, but there is not currently a wireless 911 surcharge legislated. Placed in suspend due to no cost recovery.
Lewis County, WA	10/17/02	Phase II	03/03	County sent Suspend letter for Phase II.

## Deployed\* PSAPs - All Phase I

\*The “deployed” date provided below is an educated estimate. Information from Intrado as to when PSAPs began to receive information has been used to determine the “date deployed.”

<u>PSAP</u>	<u>Date Deployed</u>
<b>The following are the same as reported in the November 2002 Quarterly Report</b>	
Adams County, CO	06/98
Arapahoe County, CO	03/00
Boulder County, CO	12/99
City and County of Denver, CO	09/98
Douglas County, CO	02/00
Eagle County, CO	05/00
Gilpin County, CO	02/00
Jefferson County, CO	03/00
Larimer County, CO	09/99
Summit County, CO	02/00
El Paso/Teller County, CO	08/00
Weld County, CO	09/99
Douglas County, NE	08/02
Sarpy County, NE	08/02
Benton County, OR	04/02
Clackamas County, OR	01/02
Columbia County, OR	01/02
Lane County, OR	04/02
Linn County, OR	04/02
Marion County, OR	01/02
Multnomah County, OR	01/02

Yamhill County, OR	10/02
King County, WA	02/02
Snohomish County, WA	09/02
Pima County, AZ	06/00
Pottawattamie County, IA	05/02
Anoka County, MN	05/99
Brookland Center, MN	05/99
Carver County, MN	05/99
Chisago, MN	05/99
Dakota County, MN	05/99
Eden Prairie, MN	05/99
Edina, MN	05/99
Gladstone, MN	05/99
Hennepin County, MN	05/99
Maplewood, MN	05/99
Metro Airport, MN	05/99
Milwaukie, MN	05/99
Minneapolis, MN	05/99
Minnetonka, MN	05/99
State Patrol, MN	05/99
Ramsey County, MN	05/99
Santiam County, MN	05/99
St. Louis Park, MN	05/99
St. Paul, MN	05/99
White Bear Lake, MN	05/99
City of Aurora, CO	01/03

## DEPLOYED PSAPS - PHASE II

El Paso/Teller County, CO	01/03
King County, WA (Washington State Patrol and and Sheriffs office only; other 3 PSAP's will be deployed in 02/03 contingent on E2 and ALI-format upgrades at PSAP).	01/03

## **APPENDIX B**

### **AFFIDAVIT**

I, Stephen W. Morgan, Senior Vice President, Network Operations and Engineering, have reviewed the attached Qwest Wireless Quarterly Report required by the Federal Communications Commission. I attest, under the penalty of perjury, that it is true and correct to the best of my knowledge.

/s/

February 3, 2003

## CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **QWEST WIRELESS, LLC AND TW WIRELESS, LLC FEBRUARY 3, 2003 PHASE II IMPLEMENTATION STATUS REPORT** to be 1) filed with the FCC via its Electronic Comment Filing System and at the email address of [E911compliancereports@fcc.gov](mailto:E911compliancereports@fcc.gov); 2) served via email on the FCC's duplicating contrator; and 3) served via first-class United States Mail, postage pre-paid, and/or email as indicated on the parties identified on the attached list.

Richard Grozier  
Richard Grozier

February 3, 2003



Robert M. Guruss  
Shook, Hardy & Bacon, LLP  
Suite 800  
600 14<sup>th</sup> Street, N.W.  
Washington, DC 20005

Counsel for the Association of Public-  
Safety Communications Officials

Evelyn Bailey  
State of Vermont Enhanced 911 Board  
94 State Street  
Drawer 20  
Montpelier, VT 05620-6501

Also via email at [evelyn.bailey@state.vt.us](mailto:evelyn.bailey@state.vt.us)  
President of the National Association of State  
Nine One One Administrators

[Qualexint@aol.com](mailto:Qualexint@aol.com)

James R. Hobson  
Miller & Van Eaton, PLLC  
Suite 1000  
1155 Connecticut Avenue, N.W.  
Washington, DC 20036-4320

Also via email at [jhobson@millervaneaton.com](mailto:jhobson@millervaneaton.com)  
Counsel for the National Emergency Number  
Association and the National Association of State  
Nine One One Administrators

Jim Goerke  
Executive Director  
National Emergency Number Association  
10509 Pariva Trail  
Austin, TX 78726

Also via email at [jgoerke@nena.org](mailto:jgoerke@nena.org)